UNITED	STATES DISTRICT COURT	,
DIS	TRICT OF DELAWARE	

DELSIE E. BROOKENS,	)
Plaintiff,	) Case No. 07-387 (JJF)
vs.	)
GENERAL MOTORS CORPORATION, a Delaware corporation, GENERAL MOTORS CORPORATION, Plan Administrator, and GM HOURLY-RATE EMPLOYEES PENSION PLAN, an employee pension benefit plan,	) ) ) )
Defendants.	) )

## STIPULATION AND ORDER

COMES NOW Plaintiff Delsie E. Brookens and Defendants GM Hourly-Rate Employees
Benefit Plan, General Motors Corporation and General Motors Corporation, Inc. (collectively
"General Motors"), by and through their undersigned counsel, and stipulate to filing the
Administrative Record under seal. In support thereof, the parties state the following:

- 1. This matter involves a claim for pension benefits brought under ERISA. The Administrative Record contains various pieces of information about the employee which are confidential, including but not limited to Social Security Number, Date of Birth and Telephone Numbers.
- 2. The Court may order that documents may be filed under seal where there is the possibility of confidential information being disseminated into the public domain. Allowing the documents to be filed under seal will protect privacy and security concerns of the documents which are filed electronically. See FRCP 5.2.

WHEREFORE the undersigned parties hereby request that this Court enter an Order allowing Defendants GM Hourly-Rate Employees Benefit Plan, General Motors Corporation and General Motors Corporation, Inc. to file the Administrative Record Under Seal.

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## UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

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Plaintiff,	) Case No. 07-387 (JJF)
vs.	)
GENERAL MOTORS CORPORATION, a Delaware Corporation, GENERAL MOTORS CORPORATION, Plan Administrator, and GM HOURLY-RATE EMPLOYEES PENSION PLAN, an employee pension benefit plan,	) ) ) ) ) ) ) ) ) ) ) )
Defendants.	)
:	<u>ORDER</u>
Upon consideration of the stipulation	entered into by all parties, IT IS HEREBY
ORDERED that Defendants GM Hourly-Rat	te Employees Benefit Plan, General Motors
Corporation and General Motors Corporation	n, Inc. may file the Administrative Record Under
Seal.	
IT IS SO ORDERED this	day of January, 2008.
	THE HONORABLE JOSEPH J. FARNAN, JR.